

December 10, 2013

Ms. Kimberly N. Tisa
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: SORR07-2
Boston, MA 02109-3912

**RE: Modification to
 Self-Implementing Cleanup and Disposal Plan
 80 Coventry Street
 Hartford, Connecticut
 Eagle Project No. 12-141.10**

Dear Ms. Tisa:

Eagle Environmental, Inc. (Eagle) is submitting this proposed modification to the Self-Implementing Cleanup and Disposal Plan (SIP) for the property located at 80 Coventry Street in Hartford, Connecticut as required by Attachment 1, Condition 18 of the PCB Cleanup and Disposal Notification Approval, dated May 23, 2013.

The construction phase of the North End Senior Center (NESC) has started and it has been determined that additional materials will be impacted by the renovations. Two (2) modifications to the approved Plan are being requested.

1. Roof Line Window Sashes and Caulks

The materials are associated with a continuous row of windows at the roof line to the NESC. These materials included an interior caulk at the base of the metal window sashes and on a metal flashing underneath, exterior caulk applied under a metal cover plate between sashes and a glazing compound. A section of the windows will have to be removed to properly tie-in the roof to the new addition being added to the existing building. These materials were sampled and determined to contain <50 ppm PCBs through laboratory analysis. These materials have been determined to be from the original construction of the building and therefore meet the definition of Excluded PCB Products under 761.3:

- The material contains PCB as a result of historic use of PCBs in the manufacture prior to US regulation of PCBs.
- The material was legally manufactured and used prior to October 1, 1984.
- The current concentration of PCB in the material is not the result of dilution or of leaks or spills in materials with PCB concentrations greater than or equal to fifty (50) PPM.

Although these materials are not regulated by the EPA, the materials that will be impacted by the renovations will be properly removed and disposed of in a state permitted non-hazardous waste landfill that accepts CT regulated waste. It is anticipated that this work will be performed under the Phase I-NESC project.

2. Rear Free-Standing Brick Wall

A free standing brick wall at the rear of the building leading to a courtyard will be removed as part of the Phase II-Former Burgdorf Health Center abatement project. There are four (4) expansion joints in the sixty (60) foot long, seven (7) foot high wall and two (2) additional caulk beads at the ends of the walls that contain similar caulk to the rest of the building. Through sampling, caulks identified to contain >50 ppm (identified on attached Source Sample Location Plan SO-1). Brick and mortar at the expansion joints (first course) and at the second brick four (4) inches away (second course) were collected. As with original sampling of the NESC and Former Burgdorf Health Center, PCBs were identified in the first course but the second course contained <1.0 ppm, as identified on attached Substrate Sample Location Plan PCB-2. The concrete foundation under an expansion joint and concrete sidewalk under the caulk bead at the end of the wall did not contain PCBs.

Soil samples were initially collected directly below all expansion joints and determined to contain >1.0 ppm in four (4) locations. Additional discrete samples were collected 2.5 feet away in each direction to determine the end points of contamination. Abatement in Areas #21 and 23 was determined to be 2.5 feet by 5 feet. Abatement in Areas #22 and 24 was determined to be 2.5 feet by 10 feet.

For the modification to the SIP, an additional forty two (42) linear feet of caulk and eighty four (84) linear feet of brick at four (4) inches wide will be removed during Phase II abatement. Four (4) additional verification samples will be collected, two (2) brick and two (2) mortar samples, following brick removal at the rear wall. All procedures as outlined in approved Plan will be followed during brick removal. The Phase II PCB Abatement specifications and associated drawings will be modified to include the caulk, brick and soil removal from the rear wall and additional verification sampling.

We look forward to your approval of this proposed modification. Please do not hesitate to contact me with any questions or comments.

Sincerely,
Eagle Environmental, Inc.

Chris Liberti
Senior Project Manager

Eagle Environmental, Inc.
8 South Main Street
Terryville, Connecticut 06780

Cc: Mr. Gary Trombly, CT DEEP

SOURCE SAMPLE LOCATIONS

SIDE-B

CONCRETE SIDEWALK

CONCRETE
SIDEWALK

FREE STANDING
BRICK WALL

10-18-PCB-02:170,000PPM

10-18-PCB-01:59,000PPM

REAR COURTYARD

SIDE-A STREET SIDE

SIDE-C

KEY:

9/07-PCB-02 = PCB SAMPLE
LOCATION AND
NUMBER

BOLDED SAMPLE NUMBERS
INDICATE PRESENCE OF PCBs IN
CONCENTRATIONS GREATER THAN 1
PPM.

BOXED SAMPLE NUMBERS

INDICATE PRESENCE OF
PCBs IN CONCENTRATIONS
GREATER THAN 50 PPM.

NOT TO SCALE

SIDE-D



EAGLE
Environmental, Inc.

8 SOUTH MAIN STREET, SUITE 3
TERRYVILLE, CONNECTICUT 06786
860-589-8257

SHEET NO.

SO-1

SHEET 1 OF 1

DATE: 11/11/13
PROJECT NO.: 13-010.10
DRAWN BY: VB
REVIEWED BY: CL

ADDITIONAL PCB INSPECTION
80 COVENTRY STREET-REAR COURTYARD
HARTFORD, CONNECTICUT
SOURCE SAMPLE LOCATION PLAN

SIDE-B



SHEET NO.

SL-1

SHEET 1 OF 1

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**80 COVENTRY STREET
HARTFORD, CONNECTICUT**

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TABLE II
PCB CONTAINING SOIL
SUMMARY TABLE
NORTH END SENIOR CENTER AND FORMER BURGDOFF HEALTH CENTER - REAR COURTYARD
80 COVENTRY STREET
HARTFORD, CONNECTICUT

SAMPLE DATE	SAMPLE #	SAMPLE LOCATION	SAMPLE DESCRIPTION	RESULT ND ND - ≤(PPM)	READING LIMIT >1 PPM - <50	CORRECTION RESULT >50 PPM
DISCRETE SOIL SAMPLES						
10/18/13	10-18-SO-01	Area #21 - at base of wall under expansion joint	Soil to 3" depth		3.30	
10/18/13	10-18-SO-02	Area #24 - at base of wall under expansion joint	Soil to 3" depth		9.10	
11/7/13	11-7-WS-01	Area #21 - 2.5' west of expansion joint at wall	Soil to 3" depth	0.59		
11/7/13	11-7-WS-02	Area #21 - 2.5' east of expansion joint at wall	Soil to 3" depth	0.47		
11/7/13	11-7-WS-03	Area #21 - 2.5' south of expansion joint at wall	Soil to 3" depth	ND		
11/7/13	11-7-WS-04	Area #22 - 2.5' west of expansion joint at wall	Soil to 3" depth		1.50	
11/7/13	11-7-WS-05	Area #22 - 2.5' east of expansion joint at wall	Soil to 3" depth		1.10	
11/7/13	11-7-WS-06	Area #22 - 2.5' south of expansion joint at wall	Soil to 3" depth	ND		
11/7/13	11-7-WS-07	Area #24 - 2.5' west of expansion joint at wall	Soil to 3" depth	ND		
11/7/13	11-7-WS-08	Area #24 - 2.5' east of expansion joint at wall	Soil to 3" depth	0.87		
11/7/13	11-7-WS-09	Area #24 - 2.5' north of expansion joint at wall	Soil to 3" depth	ND		
11/7/13	11-7-WS-10	Area #23 - 2.5' west of expansion joint at wall	Soil to 3" depth		1.20	
11/7/13	11-7-WS-11	Area #23 - 2.5' east of expansion joint at wall	Soil to 3" depth		1.30	
ND = NONE DETECTED				ANALYTICAL METHOD		
SOXHLET EXTRACTION 8082						

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SUMMARY TABLE
NORTH END SENIOR CENTER AND FORMER BURGDOFF HEALTH CENTER - REAR COURTYARD
80 COVENTRY STREET
HARTFORD, CONNECTICUT

SAMPLE DATE	SAMPLE #	SAMPLE LOCATION	SAMPLE DESCRIPTION	CORRECTED RESULT (PPM)*		
				RESULT	ND	CORRECTION
11/7/13	11-7-WS-12	Area #23 - 2.5' north of expansion joint at wall	Soil to 3" depth	ND		
11/7/13	11-7-WS-13	Area #21 - at base of wall under expansion joint	Soil to 6" depth	1.00		
COMPOSITED SOIL SAMPLES						
11/11/13	11-11-EL-SO-01	Area #22 - 5' West of expansion joint at wall	Soil to 3" depth	0.57		
11/11/13	11-11-EL-SO-02	Area #22 - 5' East of expansion joint at wall	Soil to 3" depth	0.84		
11/11/13	11-11-EL-SO-03	Area #23 - 5' East of expansion joint at wall	Soil to 3" depth	0.56		
11/11/13	11-11-EL-SO-04	Area #23 - 5' West of expansion joint at wall	Soil to 3" depth	ND		
KEY				ANALYTICAL METHOD		
ND = NONE DETECTED				SOXHLET EXTRACTION 8082		